

Environmental Protection Department

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CIBA-GEIGY

REC'D 6-11-91

F.B. (04)

June 6, 1991

Mr. Frank Battaglia  
Project Manager  
USEPA Region I  
Waste Management Building  
90 Canal Street  
Boston, MA 02114

Action: MET ON 6-21-91 —  
REQUEST DENIED  
VERBALLY 6-27-91.

Re: Benefits of Splitting Phase II Work into Phases IIA and IIB

Dear Mr. Battaglia:

This letter describes the benefits of splitting the Phase II work for the RCRA Facility Investigation (RFI) of the CIBA-GEIGY Cranston facility into two parts — Phase IIA and Phase IIB. After completing the Phase IIA work, a *Phase IIA Report* would be prepared and submitted to the USEPA for review and approval. The scope of work and schedule proposed for both the Phase IIA and Phase IIB investigations will be outlined in a forthcoming document, and will be described in detail in the *Phase I Interim Report and Phase II Proposal* (currently scheduled to be submitted 8/14/91).

The Phase II field schedule is 8 months; 13 weeks are scheduled for completing the *RFI Report*. The work in Phase II includes at least two rounds of sampling, the risk assessment (PHERE), and the proposal of media protection standards. Because the RFI is driven by the risk assessment and Corrective Measures Study, additional guidance from the USEPA is critical during Phase II.

### Benefits of the Proposal

Splitting Phase II into Phases IIA and IIB offers a variety of important benefits:

**Checkpoint in Phase II.** Splitting Phase II creates a checkpoint roughly midway through Phase II when preliminary (i.e., Phase IIA) results from several investigations (performed by different contractors and personnel) can be organized, analyzed, and interpreted as a whole. The impacts of the Phase IIA results on the Phase IIB work plans can be assessed, and the data gaps identified in Phase IIA can be filled in Phase IIB.

**Additional Documentation to USEPA.** The *Phase IIA Report*, to be submitted about midway through Phase II, will present those preliminary results and conclusions to the USEPA for review and approval. The *Phase IIA Report* also could:

WHAT'S  
OBJECTIVE OF  
EACH PHASE?



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- ✓ • present the analytical results from Phase IIA delineation sampling.
- ✓ • propose modifications to the Phase IIB analytical sampling strategy and techniques based on the Phase IIA analytical results,
- ✓ • present (for the first time) an evaluation of the statistical variability of results from the same location or the same SWMU,
- ONLY IN PROD. AREA & MAYBE WWT P AREAS ✓ • begin the transition from SWMUs to CAMUs (corrective action management units — areas composed of two or more SWMUs that require similar remedies),
- ✓ • continue to evaluate, and possibly reduce, the number of corrective measures alternatives to be considered in Phase IIB,
- ✓ • propose treatability studies (if necessary),
- DOES NOT SEEM LIKELY ✓ • propose modified analytical techniques required for the risk assessment (such as lower detection limits for certain compounds), and
- ✓ • compile the physical and chemical characteristics of the analytes detected on-site (data needed for the ground water model).

✓ **Earlier Documentation to USEPA.** The *Phase IIA Report* will document many of the results and conclusions from the Phase II investigations earlier than they could be presented otherwise.

✓ **Additional USEPA Guidance.** Splitting Phase II creates an opportunity for the USEPA to provide additional guidance while Phase II is underway.

✓ **Improved Phase IIB Work Plan.** The work plan for Phase IIB can be modified based on the results from Phase IIA and on the guidance obtained from the USEPA. Data gaps identified in Phase IIA can be closed in Phase IIB. If necessary, the scope of the Phase IIB investigation can be revised.

✓ **Early RFI Documentation.** The *Phase IIA Report* provides a “head start” on developing the *RFI Report*, because the *RFI Report* will (in many respects) be able to augment the results and conclusions presented in the *Phase IIA Report* as well as the *Phase I Interim Report*.

✓ **Data Review for Risk Assessment (PHERE).** The Phase IIA investigation would be designed to complete the collection of all the data required for the numerical models used in the risk assessment. Phase IIA would reveal any data gaps that must be filled in Phase IIB; the work plan for Phase IIB would be modified to develop a complete and accurate risk assessment.



**Data Review for MPS Proposal.** The Phase IIA investigation also would be designed to ensure that all the data needed in order to propose effective and complete media protection standards will be collected by the end of Phase IIB. Again, Phase IIA would reveal data gaps to be filled in Phase IIB.

**Focused Review of RFI Results.** Developing the *Phase IIA Report* permits reducing the size of the *RFI Report* (because many of the Phase II results will have been documented in detail already), allowing reviewers to focus on:

- the new findings from Phase IIB,
- the *Risk Assessment (PHERE) Report*, and
- the *Media Protection Standards (MPS) Proposal*.

Phase II will be completed in the time frame originally scheduled (in the *RFI Proposal*) and the clock would stop during USEPA review of the *Phase IIA Report*, but with EPA approval work will continue as in Phase I. Because of additional opportunities for USEPA review, the overall project timeline could be shortened.

## Precedent

In order to obtain additional guidance from the USEPA, CIBA-GEIGY requested that the Phase I work for this RFI be split into two parts — Phases IA and IB. The USEPA approved the request. After completing the Phase IA field work, the *Phase IA Report* was submitted to (and approved by) the USEPA. In retrospect, splitting Phase I was useful for many reasons:

**Checkpoint in Phase I.** Splitting Phase I created a checkpoint when the Phase IA results from several investigations were analyzed, organized, and interpreted together. We reviewed preliminary results and identified data gaps between Phases IA and IB.

**Additional Documentation to USEPA.** The *Phase IA Report* presented those preliminary results and conclusions to the USEPA for review and approval.

**Earlier Documentation to USEPA.** The *Phase IA Report* documented preliminary physical characterizations of the site earlier than would have been possible otherwise.

**Additional USEPA Guidance.** Splitting Phase I allowed additional guidance to be obtained from the USEPA while Phase I was underway.

**Improved Phase IB Work Plan.** The work plan for Phase IB was modified based on the results from Phase IA and on the guidance obtained from the USEPA. Splitting Phase I ensured that the data gaps identified in Phase IA were closed in Phase IB.

**Early Phase I Documentation.** The *Phase IA Report* provided a head start on developing the *Phase I Interim Report* and *Phase II Proposal*. In many respects, the *Phase I Interim Report* will augment the results and conclusions presented in the *Phase IA Report*.

THEN, HOW COME THEY  
STILL NEED MORE  
TIME FOR  
PHASE I INT. REPORT?

**Focused Review of Phase I Results.** Developing the *Phase IA Report* permitted reducing the size of the *Phase I Interim Report* (because many of the Phase I results had been documented in detail already), allowing reviewers to focus on new findings from Phase IB and on the *Phase II Proposal*.

In addition to these benefits, the Phase I work was not delayed — Phase I will be completed in the time frame originally scheduled (in the *RFI Proposal*).

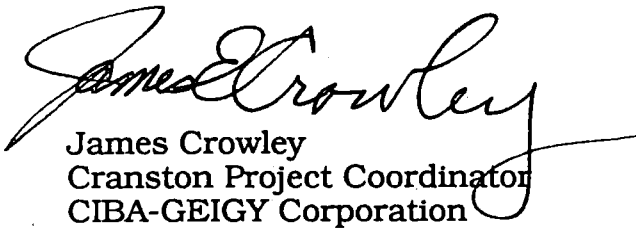
### **Summary**

Splitting Phase I into Phases IA and IB proved beneficial. Splitting Phase II into two parts — Phases IIA and IIB — offers even more benefits for this RFI, including the opportunity to:

- obtain additional guidance from the USEPA,
- improve the Phase IIB work plan based on the Phase IIA results,
- improve the *RFI Report* (and make it easier to review),
- improve the risk assessment (by filling all data gaps in a timely fashion), and
- improve the proposal of media protection standards (again, by filling all data gaps).

We will be glad to discuss any aspect of this proposal with you.

Very truly yours,



James Crowley  
Cranston Project Coordinator  
CIBA-GEIGY Corporation